



## **MacEwen Agricentre Inc.**

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# **Company Compliance Report: Supply Chains Act (Bill S-211)**

## **Introduction**

This compliance report is prepared in response to the Supply Chains Act, Bill S-211, which aims to address modern slavery and human rights violations within supply chains. Our company recognizes the importance of ethical sourcing and is committed to upholding human rights standards throughout our operations and supply chain.

## **Requirement (A) – Structure, activities, and supply chains**

### **Company Overview**

MacEwen Agricentre Inc. is an agri-food services and supply company, with head office in Maxville, Ontario. We provide Eastern Ontario and Western Quebec farmers with grain elevator storage and services, crop input supplies, and superior quality feed. The company is categorized under several NAICS categories, but primarily NAICS 311110 Animal food manufacturing, NAICS 325314 - Mixed fertilizer manufacturing, and NAICS 411120 - Oilseed and grain merchant wholesaler. The company's business number is 103432936.

The company was originally incorporated in Ontario under the name MacEwen Feed & Fertilizer Inc on November 16, 1983. The company changed its name to MacEwen Agricentre in August 2012. In 2014, the company acquired a majority shareholding in 525121 Ontario Limited (Millar Feed & Seed), and in 2018, the company amalgamated its operations with Millar.

MacEwen Agricentre Inc. has over 100 employees in three locations within Eastern Ontario: Maxville, which has a feed mill, grain storage and fertilizer blending operations; Vars which has fertilizer blending operations; and Cobden which has grain storage and fertilizer blending operations.

The company does not have reporting obligations in any other jurisdiction. We follow all provincial and federal guidelines with our hiring practices, and do not knowingly engage in any activity which would contravene the Supply Chains Act, Bill S-211.

## **Supply Chains**

The company has several hundred active suppliers including dozens of local family-run farms that supply our company with corn, wheat, and soybeans. Most of our suppliers are small businesses and subcontractors.

The vast majority of our raw materials and operating expenses including feed ingredients, grain, and seed, are sourced either locally and/or within Canada, or through Canadian distributors, with most of these in Ontario and Quebec. Further down the supply chain, herbicides and pesticides are manufactured in the United States (US). Some of our dry fertilizer raw materials include MAP (monoammonium phosphate) and Granular Urea. MAP is generated by the extraction of phosphatic rocks and through a reaction process between phosphoric acid and ammonia. It is presented in granular form and is manufactured either in the US or Morocco. Urea is manufactured from reacting CO<sub>2</sub> with ammonia and is one of the most commonly used Nitrogen fertilizers, typically manufactured in India or the US. These products are always sourced through our Canadian distributors.

### **Requirement (B) – Policies and due diligence processes**

MacEwen Agricentre has updated our Code of Business Conduct and developed a Modern Slavery & Human Trafficking policy. MacEwen has also developed a Supplier Code of Conduct. A copy of our Supplier Code of Conduct is posted on our company website ([www.macewenagricentre.com](http://www.macewenagricentre.com)).

### **Requirement (C) – Forced labour and child labour risks**

There are two main supply chain areas that carry a relatively small risk of forced labour or child labour.

#### Supplier Input Category - Dry fertilizer

MAP and granular Urea is generally sourced further down the supply chain from either India or Morocco, and through our Canadian distributors.

Our discussions with each of our Canadian suppliers indicated that they had their own Ethics & Compliance rules governing their operations, which included Human Rights compliance within their own supply chains.

### Supplier Input Category - Grain

Food supply chains do present a number of inherent risks to workers, including children. The presence of smallholder farmers and informal employment arrangements with seasonal workers can potentially contribute to exploitation. Canada and the provinces have very strong legislation on child labour enforcement, but farmers are largely exempt from federal child labour laws, and children as young as 12 can work unlimited hours harvesting crops, provided they have their parents' consent, and they don't miss school.

In addition, the farms that we deal with typically do not use intensive labour in their seeding and harvesting process. This is primarily machinery & equipment driven requiring skilled labour.

### **Requirement (D) – Remediation measures**

We have assessed that our activities and supply chains do not carry a risk of forced labour or child labour, and the question of remediation is not applicable.

### **Requirement (E) – Remediation of loss of income**

We have assessed that our activities and supply chains do not carry a risk of forced labour or child labour, and the question of remediation of loss of income is not applicable.

### **Requirement (F) - Training**

We have been actively looking for a training program that suits our needs. Once one is sourced, staff identified as having a role in the procuring of goods for MacEwen Agricentre will be required to complete the training.

### **Requirement (G) – Assessing effectiveness**

We have completed a Risk Assessment of our suppliers for whom the yearly gross purchase amounts is \$1,000,000 and greater. This assessment assesses a supplier's risk to our organization by looking at quality control processes, supply chain risks, and assessing regulatory compliance. Our suppliers were also asked to review and sign a copy of our Client Code of Conduct.

**Conclusion**

MacEwen Agricentre is fully committed to compliance with the Supply Chains Act, Bill S-211, and to the protection of human rights across our operations and supply chain. We recognize the importance of ongoing diligence and collaboration to address modern slavery and other human rights violations effectively.

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for MacEwen Agricentre. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Authorized Signatory

  
\_\_\_\_\_  
Jim MacEwen, President

5/15/2025  
\_\_\_\_\_  
Date